

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JOHN WILSON,

Defendant

Cr. No. 19-10080-LTS

DEFENDANT JOHN WILSON'S ASSENTED-TO MOTION FOR RETURN OF FINE

Defendant John Wilson respectfully requests that this Court issue an order directing the return of the \$200,000.00 that Mr. Wilson paid as a fine following his conviction.

On February 18, 2022, the Court entered judgment against Mr. Wilson, imposing a fine of \$200,000.000. Dkt. # 2536. Mr. Wilson satisfied the judgment in this respect by making payment in full.

Mr. Wilson appealed his conviction, and on May 10, 2023, the First Circuit entered judgment vacating Mr. Wilson's conviction on seven of the eight counts on which he was convicted. Dkt. # 2679. On June 29, 2023, the First Circuit issued its mandate. Dkt. #2685.

Mr. Wilson requests that the Court issue an order directing the Clerk of Court to return his \$200,000.00. This fine was imposed for the now-reversed Counts 1 and 2 in the amount of \$100,000.00 for each of those two counts. Judgment, Dkt. # 2536. In its resentencing, currently scheduled for September 14, 2023, the Court will make its determination of any appropriate fine for a conviction on a single tax count, Count 13.

The undersigned have conferred with counsel for the Government, and they have assented to the relief requested in this motion.

Dated: July 21, 2023

Respectfully submitted,

Counsel for John Wilson

/s/ Michael Kendall

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, undersigned counsel certifies that he conferred with counsel for the Government in a good-faith attempt to resolve the issue presented by this motion. The Government indicated it assents to the motion.

/s/ Michael Kendall
Michael Kendall